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Amendment; that the plaintiff's billboards were built upon private ground and were free from damages resulting from fire and wind; that contracts entered into before the enactment of this ordinance placed duties upon the plaintiff to maintain for three years advertisements of a standard size which was larger than the ordinance allowed. *Held*, that the ordinance must be upheld. *St. Louis Poster Advertising Co. v. St. Louis* (1919) 39 Sup. Ct. 274.

The instant decision reinforces the earlier cases in asserting that billboards may be placed in a class by themselves and prohibited in residential districts, or be discouraged by a high tax, or prohibited altogether; that such legislation will not be declared invalid because of an incidental effect upon duties resulting from contracts or because some of the objectionable features may have been eliminated or because of trifling requirements which are not aimed solely to satisfy basic wants. *Thomas Cusack Co. v. Chicago* (1917) 242 U. S. 526, 37 Sup. Ct. 190, discussed in (1917) 26 YALE LAW JOURNAL, 420. In support of the constitutionality of statutes forbidding advertising signs on property, see (1914) 24 YALE LAW JOURNAL, 1.

CONSTITUTIONAL LAW—DUE PROCESS—PROHIBITORY LIQUOR STATUTE.—The defendant was convicted for having liquor in his possession in violation of a prohibitory liquor statute. The statute, by its terms, did not become effective until several months after its approval, and it was in this interim that the defendant acquired his stock of liquor. It was contended that if the statute was construed to apply to liquor so acquired, it was void under the Fourteenth Amendment. *Held*, that such construction did not make the statute invalid. *Barbour v. State of Georgia* (1919) 39 Sup. Ct. 316.

It has been settled that the exercise of a State's police power cannot be obstructed by a person's entering into a contract after the enactment of the statute and with full notice of the time it is to become effective. *Diamond Glue Co. v. United States Glue Co.* (1902) 187 U. S. 611, 23 Sup. Ct. 206. The Court refused to pass on the more doubtful question as to the constitutionality of the statute if applied to liquor acquired before its enactment. The similar question as to whether the prohibition of sale may be constitutionally applied to liquor acquired previous to the approval of the statute has also been raised by the United States Supreme Court but not settled. *Bartemeyer v. Iowa* (1874) 18 Wall. 129, 21 L. ed. 929; *Beer Company v. Massachusetts* (1877) 97 U. S. 25, 24 L. ed. 989.

CONSTITUTIONAL LAW—REED AMENDMENT—NOT PROHIBITIVE OF TRANSPORTATION OF LIQUOR THROUGH A STATE.—The defendant was indicted for having transported liquor into Virginia in violation of the Reed amendment. The facts showed that the defendant was travelling on a through ticket from Maryland to North Carolina, and was arrested while the train was temporarily stopped in Virginia, although he had no intention of leaving the train until it arrived in North Carolina. *Held*, that the motion to quash was properly granted. *United States v. Gudger* (1919) 39 Sup. Ct. 323.

This decision interprets the prohibition against transporting liquor in interstate commerce "into any State or Territory the laws of which State or Territory prohibit the manufacture" as not to include the movement in interstate commerce through such a state to another. Says Chief Justice White: "The word 'into,' as used in the statute, refers to the state of destination, and not to the means by which that end is reached, the movement through one State as a mere incident of transportation to the State into which it is shipped." For a similar ruling in regard to the interpretation of a state statute of similar import, see *State v.*